

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ROBERT FOOTE, derivatively on behalf  
of MICRON TECHNOLOGY, INC.,

Plaintiff,

v.

SANJAY MEHROTRA, ROBERT L.  
BAILEY, RICHARD M. BEYER,  
PATRICK J. BYRNE, LYNN A. DUGLE,  
STEVEN J. GOMO, MERCEDES  
JOHNSON, MARY PAT MCCARTHY,  
LAWRENCE N. MONDRY, ROBERT E.  
SWITZ, and MARYANN WRIGHT,

Defendants,

and

MICRON TECHNOLOGY, INC.,

Nominal Defendant.

C.A. No. 21-0169-CFC

**DEFENDANTS' MOTION TO DISMISS THE COMPLAINT**

Defendants Sanjay Mehrotra, Robert L. Bailey, Richard M. Beyer, Patrick J. Byrne, Lynn A. Dugle, Steven J. Gomo, Mercedes Johnson, Mary Pat McCarthy Lawrence N. Mondry, Robert E. Switz, and MaryAnn Wright (collectively the “Individual Defendants”) and Nominal Defendant Micron Technology, Inc. (“Micron” or the “Company,” and together with the Individual Defendants, the

“Defendants”) hereby move to dismiss Plaintiff’s Complaint pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(6) and 23.1. The grounds for this motion are set forth in the Opening Brief in Support of Defendants’ Motion to Dismiss the Verified Shareholder Derivative Complaint, filed contemporaneously herewith.

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*Counsel for Defendants*

Dated: April 30, 2021